Document 24

Filed 07/29/2008 Page 1 of 2

"ALICE" YU-PING CHEN DEC. IN SUPPORT OF PLAINTIFFS' MOTION

Case 3:08-cv-03514-JSW

28

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

28

I, ALICE CHEN, HEREBY DECLARE AS FOLLOWS:

- 1. I am a resident of Palo Alto, California. All of the facts set forth herein are known to me personally, and if called as a witness, I could testify competently to them.
- 2. On behalf of my employer, the law firm of Finnegan Henderson Farabow Garrett & Dunner LLP located in Palo Alto, California, I used the Beijing Ticketing.com website ("Beijing Ticketing") to place two separate orders for tickets to various sporting events at the upcoming Olympic Games. I placed the first order on February 1, 2008 for ten tickets at a total cost of \$3,072.57. I placed another order on July 9, 2008 for 20 tickets at a total cost of \$6,111.43.
- 3. The Olympic logos on the Beijing Ticketing website led me to believe that the website was an official source of Olympic tickets and that I was buying tickets that were legitimate.
- At no time when placing either order did Beijing Ticketing ask for nor 4. did I provide photographs or passport information.
- I did not receive any tickets. I did some research and attempted to 5. contact Beijing Ticketing via telephone and email but received no response. At this point, I do not believe I will receive the tickets I ordered. Attached as Exhibit A are true and accurate copies of my email correspondence with Beijing Ticketing.
- 6. After reading a press release issued by the United States Olympic Committee (the "USOC"), I contacted the USOC on July 25, 2008 to offer my help in this matter.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 29th day of July, 2008 at Palo Alto, California.

Case 3:08-cv-03514-JSW Document 24-2 Filed 07/29/2008 Page 1 of 17

Exhibit A

From: sales@beijingticketing.com

Sent: Friday, February 01, 2008 5:45 PM

To: C

Chen, Alice

Cc:

admin@beijingticketing.com

Subject: Welcome to BeijingTicketing.com



为	75	
Badminton Tickets	Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	S Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	F3 Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	53 Judo Tickets	Tennis Tickets
万 Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Nolleyball Tickets
Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
Diving Tickets	Caremony Tickets	Weightlifting Tickets
Ticket Sales: General Information Home	About Us Contact Us My A	ccount Site Map
General Information Home Beijing	: sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights	ccount Site Map
General Information Home	: sales@beijingticketing.c	ccount Site Map
General Information Home Beijing Terms and G	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	: sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and the	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map
General Information Home Beijing Terms and	sales@beijingticketing.c About Us Contact Us My A Ticketing 2008 Inc. All rights Conditions Contact us at:sales@beijingticketing	ccount Site Map

Quantity:

Quantity:

Quantity:

Price:

Total:

Price:

Total:

\$475.00

\$950.00

\$175.00

\$350.00

\$175.00

\$350.00

Price:

Total:

From:

sales@beijingticketing.com

Sent:

Friday, February 01, 2008 5:58 PM

To:

Chen, Alice

Cc:

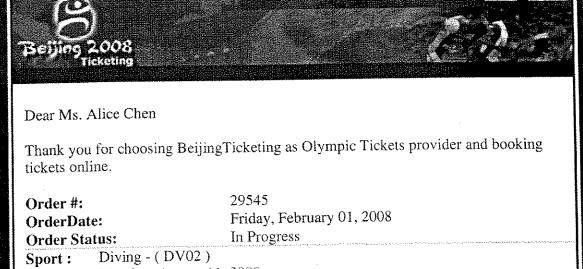
admin@beijingticketing.com

Subject:

Your Order at BeijingTicketing 2008

Follow Up Flag: Follow up Flag Status:

Flagged



Date:

Monday, August 11, 2008

Time:

14:30 - 15:45

Category: Best Seating in venue Venue:

National Aquatics Centre

City: Session

Details:

Men's Synchronised 10m Platform Finals-Round 00 Men's Synchronised 10m Platform Medal Ceremony

Sport:

Volleyball - (VO10)

Date: Time:

Tuesday, August 12, 2008 09:00 - 12:30

Category: Best Seating in venue

Venue:

Beijing Institute of Technology Gymnasium

City:

Men's Preliminaries - Group B Match 04 Session

Details: Sport:

Men's Preliminaries - Group B Match 05 Gymnastics Artistic - (GA09)

Date:

Wednesday, August 13, 2008

Time:

10:15 - 12:20

Venue:

Category: Best Seating in venue National Indoor Stadium

City:

Beijing

Session

Women's Team Final

And the same of th	Women's Team M		A Section of more recognitions and an experience of more recognitions.	The factor of the second of th
Sport :	Swimming - (SW			
Date:	Thursday, August	14, 2008		
Time :	10:00 - 12:03	,		
	Best Seating in ve	enue		
Venue:	National Aquatics	s Centre		
City:	Beijing	a ways 1		
	Men's 200m Brea			
	Women's 100m F	reestyle Semifinal 00	O	3
		stroke Semifinal 00	Quantity : Price :	\$475.00
		ststroke Medal Ceremony		\$950.00
	Women's 200m B		Total:	かいひことか
Session	Men's 100m Free	style Final		
Details :		reaststroke Semifinal 00		
erctans.		vidual Medley Semifinal 00		
	Women's 200m B	Sutterfly Medal Ceremony		
	Women's 4 x 200	m Freestyle Relay Final		
	Men's 100m Free	style Medal Ceremony		
		m Freestyle Relay Medal		
and the second s	Ceremony		<u></u>	
Sport :	Table Tennis - (
Date :	Friday, August 1:	5, 2008		
Time:	10:00 - 13:00		Quantity:	2
Category:	Best Seating in ve	enue	Price:	\$175.00
Venue:	Peking University	y Gymnasium	Total:	\$350.00
City:	Beijing			
Session	Women's Team (
Details:	Women's Team (and the first of the external terminal terminal terminal and the second section of the second	
Sub Total	:	\$2950.00		
Delivery F	ee:	\$30.00		
Γotal :		\$2980.00		
Your Order card you w	ill get an Order co	. As soon as we successfully onfirmation email.	process your Cred	it/Debit
Archery Con	npetition 10 Aug 08	Badminton Competition Sat, 09 Aug 08	Baseball Compe	ug 08
Get t Ticke Loca Com	he Best Archery ets on the tions The Archery petition In Beijing onal Stadium	Get the Best Badminto Tickets on the Locations The Badminton Competitio In Beijing University	Tickets of Locations Competit	The Baseb
ames:				
2		**	- Parameter	

Filed 07/29/2008

Archery Tickets	Equestrian Tickets	Rowing Tickets
Athletics Tickets	Fencing Tickets	Sailing Tickets
Badminton Tickets	S Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	Judo Tickets	★ Tennis Tickets
区 Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Volleyball Tickets
Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
B Diving Tickets	Opening Ceremony Tickets	Weightlifting Tickets

Please feel free to contact www.BeijingTicketing.com team for any queries and further information.

Ticket Search Helpline:

+44 (0) 207 593 2088

Ticket Sales:

sales@beijingticketing.com

General Information:

sales@beijingticketing.com



Home | About Us | Contact Us | My Account | Site Map Beijing Ticketing 2008 Inc. All rights reserved.

Terms and Conditions | Contact us at:sales@beijingticketing.com

From:

sales@beijingticketing.com

Sent:

Monday, February 04, 2008 9:12 AM

REDACTED

Quantity:

\$475.00

\$950.00

Price:

Total:

To:

Chen, Alice

Cc:

admin@beijingticketing.com

Subject:

Your Payment Received.

Follow Up Flag: Follow up Flag Status:

Flagged



Dear Ms. Alice Chen

Thanks for choosing our services to book your tickets online. We have received the payment and your tickets will be dispatched within 2-4 four weeks prior to the event date.

American Express Card Users:

Please Note that orders with American Express cards will be charged in British Pounds (GBP) Currency. Currency conversion rates of the order date will be used in currency conversion. Please be advised that your credit card statement will show transaction in GBP (British Pounds) against this order. Please contact our sales team if you need any further assistance.

Many Thanks

Beijingticketing.com

Order #:

29545

OrderDate:

Friday, February 01, 2008

Order Status:

Paid

Diving - (DV02) Sport:

Date:

Monday, August 11, 2008

Time:

14:30 - 15:45

Category: Best Seating in venue

Venue:

National Aquatics Centre

Beijing City:

Session Details: Men's Synchronised 10m Platform Finals-Round 00 Men's Synchronised 10m Platform Medal Ceremony

Sport:

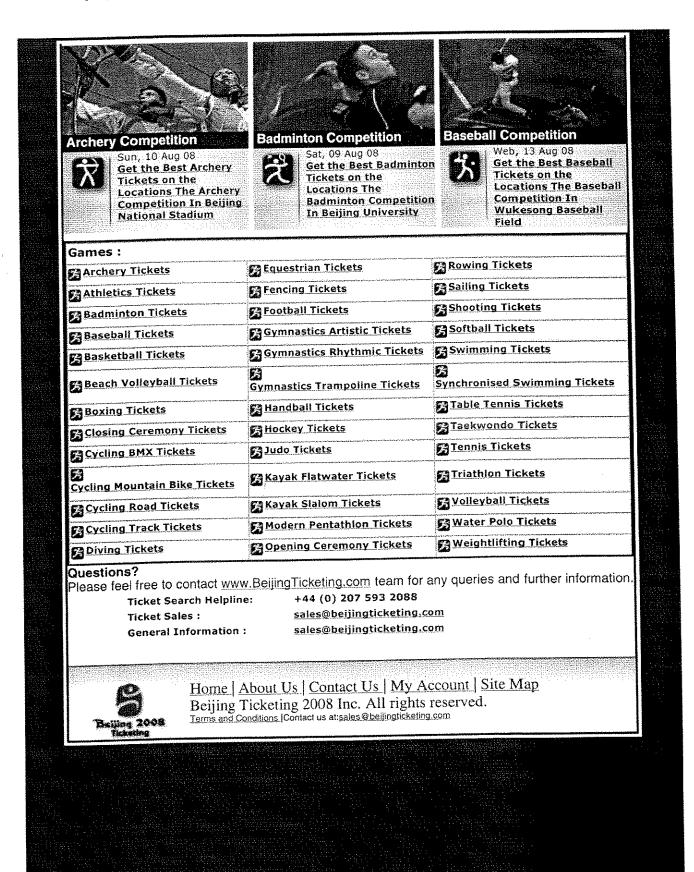
Volleyball - (VOIO)

Date:

Tuesday, August 12, 2008

Category:	99:00 - 12:30 Best Seating in venue Beijing Institute of Technology Gymnasium	Quantity : Price : Total :	2 \$175.00 \$350.00
	Beijing	i otai .	φυρυ:
Session 1	Men's Preliminaries - Group B Match 04		
	Men's Preliminaries - Group B Match 05		
*** * **	Gymnastics Artistic - (GA09)		
20 414 6	Wednesday, August 13, 2008		
	10:15 - 12:20	Quantity:	2
	Best Seating in venue National Indoor Stadium	Price:	\$175.00
, cancer	Beijing	Total:	\$350.00
	Women's Team Final		
	Women's Team Medal Ceremony		
	Swimming - (SW10)		
	Thursday, August 14, 2008		
Time:	10:00 - 12:03		
Category:	Best Seating in venue		
Venue:	National Aquatics Centre		
City:	Beijing		
	Men's 200m Breaststroke Final		
	Women's 100m Freestyle Semifinal 00 Men's 200m Backstroke Semifinal 00	Quantity:	2
	Men's 200m Breaststroke Medal Ceremony	Price:	\$475.00
	Women's 200m Butterfly Final	Total:	\$950.00
	Men's 100m Freestyle Final		
Session	Women's 200m Breaststroke Semifinal 00		
Details:	Men's 200m Individual Medley Semifinal 00		
	Women's 200m Butterfly Medal Ceremony		
,	Women's 4 x 200m Freestyle Relay Final		
	Men's 100m Freestyle Medal Ceremony		
	Women's 4 x 200m Freestyle Relay Medal		
and the house of the second se	Ceremony (TT07)	and the second s	
	Table Tennis - (TT07) Friday, August 15, 2008		
	10:00 - 13:00	0 44	
	Best Seating in venue	Quantity:	
Venue:	Peking University Gymnasium	Price : Total :	\$175.0 \$350.0
	Beijing	iotai;	O.OCCĢ
Session	Women's Team Quarterfinal 1		
	Women's Team Quarterfinal 2		
Sub Total:	\$2950.00		

Delivery Fe	\$2980.00		



Filed 07/29/2008

REDACTED

From:

sales@beijingticketing.com

Sent:

Tuesday, July 08, 2008 8:25 PM

To:

Chen, Alice

Cc:

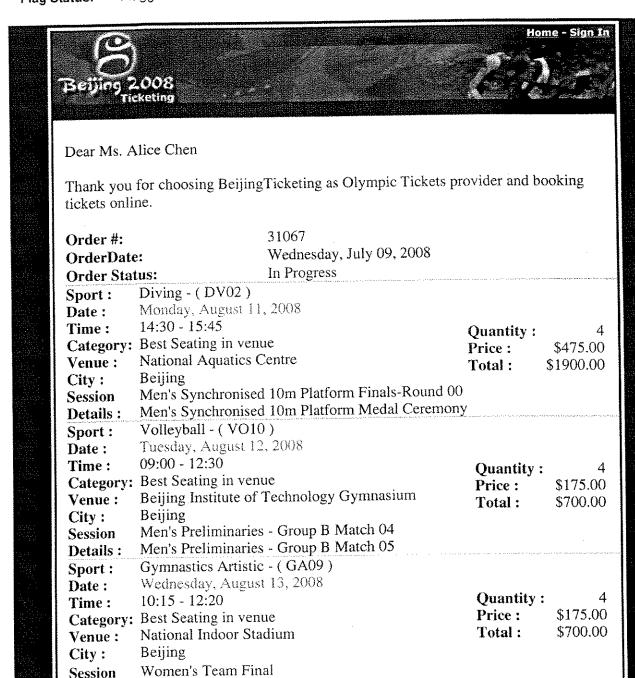
admin@beijingticketing.com

Subject:

Your Order at BeijingTicketing 2008

Follow Up Flag: Follow up Flag Status:

Flagged



Details:	والمراجعة والمستور الدراء ورادي الأراء المستقورة فستوجه والوراء فالمرسوم والرسف للوم	Medal Ceremony	19. Europe'n meter men 20. Europin men den meter bestelde der til de den men teknis men til de de meter den me
Sport:	Swimming - (SV		
Date :	Thursday, Augus	st 14, 2008	
Time:	10:00 - 12:03	·	
Category:			
Venue:	National Aquation	es Centre	
City:	Beijing	totuelee Timel	
	Men's 200m Bre		
		Freestyle Semifinal 00 kstroke Semifinal 00	Quantity: 4
		aststroke Medal Ceremony	Price: \$475.00
	Women's 200m B		Total: \$1900.00
	Men's 100m Free		
Session		Breaststroke Semifinal 00	
Details:		ividual Medley Semifinal 00	
	Women's 200m	Butterfly Medal Ceremony	
	Women's 4 x 20	Om Freestyle Relay Final	
	Men's 100m Fre	estyle Medal Ceremony	
		0m Freestyle Relay Medal	
	Ceremony		
Sport:	Table Tennis - (TT07)	
Date:	Friday, August l	15, 2008	
Time:	10:00 - 13:00		Quantity: 4
Category:	: Best Seating in	venue	Price: \$175.00
Venue:	Peking Universi	ty Gymnasium	Total: \$700.00
City:	Beijing	0	
Session	Women's Team		•
The state of the s	Women's Team	\$5900.00	المواقع المراقع المواقع ال
Sub Total		\$3900.00	
Delivery 1	∉ee:	\$5930.00 \$5930.00	
Total:		\$3930.00	
card you v	will get an Order o	w. As soon as we successfully ponfirmation email.	process your Credit/Debit
Featured	-vents		
	- 7 * Y F N		
	mnetition		Daseball Competition
		Badminton Competition Sat, 09 Aug 08	Baseball Competition Web, 13 Aug 08
Sun Get	, 10 Aug 08 the Best Archery	Sat, 09 Aug 08 Get the Best Badminton	Web, 13 Aug 08 Get the Best Baseball
Get Tick	, 10 Aug 08 the Best Archery Kets on the	Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The	Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball
Sun Get Tick Loc Con	, 10 Aug 08 the Best Archery kets on the ations The Archery npetition In Beijing	Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The Badminton Competition	Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball Competition In
Sun Get Tick Loc Con	, 10 Aug 08 the Best Archery kets on the ations The Archery	Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The	Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball
Sun Get Tick Loc Con	, 10 Aug 08 the Best Archery kets on the ations The Archery npetition In Beijing	Sat, 09 Aug 08 Get the Best Badminton Tickets on the Locations The Badminton Competition	Web, 13 Aug 08 Get the Best Baseball Tickets on the Locations The Baseball Competition In Wukesong Baseball

Archery Tickets	Equestrian Tickets	Rowing Tickets
Athletics Tickets	Fencing Tickets	Sailing Tickets
Badminton Tickets	Football Tickets	Shooting Tickets
Baseball Tickets	Gymnastics Artistic Tickets	Softball Tickets
Basketball Tickets	Gymnastics Rhythmic Tickets	Swimming Tickets
Beach Volleyball Tickets	S Gymnastics Trampoline Tickets	Synchronised Swimming Tickets
Boxing Tickets	Handball Tickets	Table Tennis Tickets
Closing Ceremony Tickets	Hockey Tickets	Taekwondo Tickets
Cycling BMX Tickets	Judo Tickets	Tennis Tickets
Cycling Mountain Bike Tickets	Kayak Flatwater Tickets	Triathlon Tickets
Cycling Road Tickets	Kayak Slalom Tickets	Yolleyball Tickets
Cycling Track Tickets	Modern Pentathlon Tickets	Water Polo Tickets
Maring Tickets	Opening Ceremony Tickets	Weightlifting Tickets

Ticket Search Helpline:

+44 (0) 207 593 2088

Ticket Sales:

sales@beijingticketing.com

General Information:

sales@beijingticketing.com



Home About Us Contact Us My Account Site Map Beijing Ticketing 2008 Inc. All rights reserved.

Terms and Conditions Contact us at:sales@beijinglickeling.com

From:

sales@beijingticketing.com

Sent:

Wednesday, July 09, 2008 4:31 AM

To:

Chen, Alice

Cc:

admin@beijingticketing.com

Subject:

Your Payment Received.

Follow Up Flag: Follow up Flag Status:

Flagged



Dear Ms. Alice Chen

Thanks for choosing our services to book your tickets online. We have received the payment and your tickets will be dispatched within 2-4 four weeks prior to the event date.

American Express Card Users:

Please Note that orders with American Express cards will be charged in British Pounds (GBP) Currency. Currency conversion rates of the order date will be used in currency conversion. Please be advised that your credit card statement will show transaction in GBP (British Pounds) against this order. Please contact our sales team if you need any further assistance.

Many Thanks

Beijingticketing.com

Order #:

31067

OrderDate:

Wednesday, July 09, 2008

Quantity:

\$475.00

\$1900.00

Price:

Total:

Order Status:

Paid

Sport:

Diving - (DV02)

Date:

Monday, August 11, 2008

Time:

14:30 - 15:45

Venue:

Category: Best Seating in venue National Aquatics Centre

City:

Session Details:

Men's Synchronised 10m Platform Finals-Round 00 Men's Synchronised 10m Platform Medal Ceremony

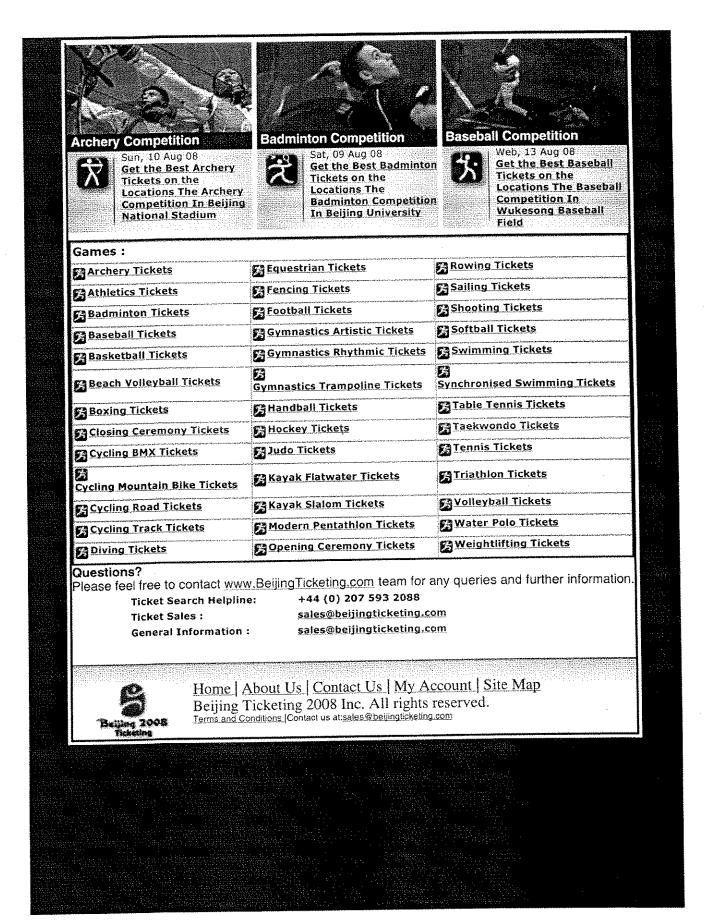
Sport:

Volleyball - (VO10)

Date:

Tuesday, August 12, 2008

Time:	09:00 - 12:30 Rest Section in verse	Quantity : Price :	4 \$175.00
Category: Venue:	Best Seating in venue Beijing Institute of Technology Gymnasium	Total:	\$700.00
City:	Beijing	iotai.	\$700.00
Session	Men's Preliminaries - Group B Match 04		
Details :	Men's Preliminaries - Group B Match 05		
Sport:	Gymnastics Artistic - (GA09)		
Date:	Wednesday, August 13, 2008		
Time:	10:15 - 12:20	Overantitus	4
Category:	Best Seating in venue	Quantity : Price :	4 \$175.00
Venue:	National Indoor Stadium	Total:	\$175.00
City:	Beijing	iotai:	\$700.00
Session	Women's Team Final		
Details :	Women's Team Medal Ceremony		
Sport:	Swimming - (SW10)		
Date:	Thursday, August 14, 2008		
Time:	10:00 - 12:03		
	Best Seating in venue		
Venue:	National Aquatics Centre		
City:	Beijing		
	Men's 200m Breaststroke Final		
	Women's 100m Freestyle Semifinal 00		
	Men's 200m Backstroke Semifinal 00	Quantity:	4
	Men's 200m Breaststroke Medal Ceremony	Price:	\$475.00
	Women's 200m Butterfly Final	Total:	\$1900.00
Session	Men's 100m Freestyle Final		
Details:	Women's 200m Breaststroke Semifinal 00		
	Men's 200m Individual Medley Semifinal 00		
	Women's 200m Butterfly Medal Ceremony		
	Women's 4 x 200m Freestyle Relay Final		
	Men's 100m Freestyle Medal Ceremony		
	Women's 4 x 200m Freestyle Relay Medal		
V - V - S - S - S - S - S - S - S - S -	Ceremony	en a seu en casa de la	
Sport:	Table Tennis - (TT07)	\$	
Date:	Friday, August 15, 2008 10:00 - 13:00		
Time:		Quantity:	4
Venue :	Best Seating in venue	Price:	\$175.00
City:	Peking University Gymnasium Beijing	Total:	\$700.00
Session	Women's Team Quarterfinal 1		
Details:	Women's Team Quarterfinal 2		
Sub Total			
	• • • • • • • • • • • • • • • • • • • •		
Delivery F			
Total:	\$5930.00	et error o company control community of the error of the	
Featured E	vents	海岭线外部 45%	
	•		



From:

Chen, Alice

Sent:

Wednesday, July 23, 2008 7:58 PM

To:

'sales@beijingticketing.com'

Subject:

Tracking orders 29545 and 31067

Importance: High

Hi,

We purchased and paid for 30 Olympic tickets but we have not received them. Can you let us know if the tickets have been shipped and when we can expect them? The order information is below:

Order Number: 29545 - 10 tickets ordered on February 1. Order Number: 31067 - 20 tickets ordered on July 9.

We really appreciate your help, we need to receive the tickets as soon as possible to coordinate ticket distribution before leaving for China.

Thank you, Alice

From:

Chen, Alice

Sent:

Thursday, July 24, 2008 1:21 PM

To:

'sales@beijingticketing.com'

Subject:

Tracking orders 29545 and 31067

Importance: High

Hi,

We purchased and paid for 30 Olympic tickets but we have not received them. Can you let us know if the tickets have been shipped and when we can expect them? The order information is below:

Order Number: 29545 - 10 tickets ordered on February 1. Order Number: 31067 - 20 tickets ordered on July 9.

We really appreciate your help, we need to receive the tickets as soon as possible to coordinate ticket distribution before leaving for China.

Thank you, Alice